



CONNECTICUT ENVIRONMENTAL HEALTH ASSOCIATION

Testimony on RB 5477: AAC The Clean Water Act and Stream Flow Regulations

To the Committee on Public Health:

The Connecticut Environmental Health Association (CEHA) represents over 300 individuals working in the field of environmental health in Connecticut.

As such we are the workforce charged with protecting public health through application of laws as they apply to sewage disposal among numerous other issues. **As a group, we oppose Raised Bill No. 5477 Section 1 (2) for a number of reasons as follows:**

1. Insertion of this bill into "An Act Concerning the Clean Water Act and Stream Flow Regulations" is spurious at best. This act concerns itself, in part, with studying and protecting water basins from the impacts of stream flow regulations. Septic tank pump outs encouraged by local health departments are also protective of water supplies and public health. This inclusion to prohibit the Commissioner of Public Health from requiring periodic pump outs and inspections is contradictory to the stated purpose of the act.
2. Many towns and health districts have passed or are passing local ordinances and regulations consistent with State health code requiring routine maintenance of septic systems by pump outs. All such regulations are reviewed by the State Department of Public Health for conformance with existing regulations. These regulations are a means to promote maintenance of septic systems and to detect problems before they become unmanageable. When failing systems are detected they are repaired protecting public health. Minor problems can be addressed before they become expensive repairs. Most pump out programs also provide reminder cards to property owners at five year intervals (an interval recommended by EPA, DEP and DPH).
3. Local health departments can pass regulations that are more stringent than the State regulations but not less so. Pump out regulations are necessary to offer a means of renewing discharge permits which are required for all new and repaired septic systems (and have been since 1982). DPH Technical Standards for on site sewage disposal recommends that permits to discharge be renewed every five years. This act would remove a tool that allows septic systems to be properly managed. The public has a right to understand their systems and maintain them without incurring a bill of \$10,000 - \$20,000+ to replace them prematurely. The public also has a right to clean drinking and surface waters that pump out regulations promote.

Please reject this Raised Bill No. 5477.

Sincerely,

Donald S. Mitchell MPH, RS, CHES
CEHA Subsurface Code Advisory Co-Chair
860-342-6718
don.mitchell@chathamhealth.org